

JENNER & BLOCK

July 28, 2009

Jenner & Block LLP
330 N. Wabash Avenue
Chicago, IL 60611-7603
Tel 312 222-9350
www.jenner.com

Chicago
Los Angeles
New York
Washington, DC

BY UPS

Suzanne J. Prysak
Tel 312 923-2915
Fax 312 840-7315
sprysak@jenner.com

Re: *In re Lehman Brothers Holdings Inc., Case No. 08-13555 (Bankr. S.D.N.Y.)*

Tishman Speyer
Rockefeller Center
45 Rockefeller Plaza
New York, NY 10111

Attention: Legal Department

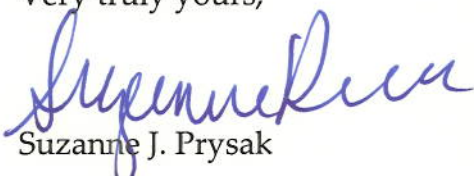
Dear Sir or Madam:

On behalf of Anton R. Valukas, Esq. the appointed Examiner for Lehman Brothers Holdings, Inc. ("LBHI") and its affiliated debtors ("Debtors"), we respectfully request that you produce, within 10 days of receipt of this request, the following documents for inspection and copying at the offices of Jenner & Block LLP, 919 Third Avenue, New York, NY 10022-3908.

"Document" should be interpreted as broadly as permitted by the Federal Rules of Civil Procedure and includes all tangible things and electronically stored information. Any terms in these requests should likewise be interpreted as broadly as possible. References to entities should be interpreted broadly to include the named entity and its affiliates, parents, subsidiaries, officers, directors, employees and agents.

If any document is withheld under a claim of privilege, please provide a privilege log containing the information required under Fed. Bankr. R. 7026, within ten (10) days following receipt of these Requests.

Very truly yours,



Suzanne J. Prysak

REQUEST NO. 1

For the period between January 1, 2007 and October 1, 2008, please produce documents relating to the risk analysis and valuation of Archstone-Smith Real Estate Investment Trust ("Archstone") and/or assets owned or controlled by it, including, but not limited to valuations, analyses, business plans, forecasts, and projections which were performed by you or any third-party, as well as all documents reflecting any decrease in the market value of Archstone and/or assets owned or controlled by it.

REQUEST NO. 2

For the period between January 1, 2006 and October 1, 2008, please produce documents relating to the formulas, processes, methodologies, and procedures that you or any third-party used in valuing Archstone-Smith Real Estate Investment Trust and/or assets owned or controlled by it.

REQUEST NO. 3

For the period between January 1, 2006 and October 1, 2008, please produce any agreements between you and any third-parties, including LBHI (and any subsidiaries or affiliates thereof) relating to Archstone-Smith Real Estate Investment Trust, including, but not limited to, term sheets, letters of intent, commitment letters, and contracts.

REQUEST NO. 4

For the period between January 1, 2006 and October 1, 2008, please produce correspondence, including e-mails, concerning: (1) agreements between you and any third-parties relating to Archstone-Smith Real Estate Investment Trust ("Archstone"); and (2) risk analysis, liquidity analysis, and valuation of Archstone and/or assets owned or controlled by it.

REQUEST NO. 5

For the period between May 1, 2007 and October 31, 2007, please produce any communications between you (including any of your agents, affiliates, or subsidiaries) and LBHI (including any agents, affiliates, or subsidiaries thereof) relating to: (1) LBHI's right to terminate its transaction to acquire Archstone-Smith Trust; and (2) any discussions concerning altering the terms of the transaction between you and LBHI relating to Archstone-Smith Trust.

REQUEST NO. 6

For the period between May 1, 2007 and October 31, 2007, please produce any internal communications within your company (including communications within, between, or among any of your agents, affiliates, or subsidiaries) relating to: (1) LBHI's right to terminate its transaction to acquire Archstone-Smith Trust; and (2) any discussions concerning altering the terms of the transaction between you and LBHI relating to Archstone-Smith Trust.

REQUEST NO. 7

For the period January 1, 2007 and September 15, 2008, please produce any documents, including emails, regarding or reflecting discussions with LBHI (including any affiliates or subsidiaries thereof) relating to potential transactions between you and LBHI which were considered but never consummated.

REQUEST NO. 8

For the period January 1, 2006 and October 31, 2007, please produce documents, including emails, relating to the negotiation with LBHI (including any affiliates or subsidiaries thereof) to purchase or acquire an interest in Archstone-Smith Real Estate Investment Trust and/or assets owned or controlled by it.